

January 31, 2003

Docket Management System
U.S. Department of Transportation
Room PL 401
400 Seventh Street, SW.
Washington, DC 20590

Re: Docket No. FAA-2002-14002. Area Navigation (RNAV) and Miscellaneous
Amendments; Proposed Rule

Dear Sirs:

On behalf of 390,000 members operating over 200,000 general aviation aircraft, many with Global Positioning System (GPS) navigation, the Aircraft Owners and Pilots Association (AOPA) offers the following comments on the Federal Aviation Administration (FAA) effort to introduce new operational capabilities for GPS operations conducted under Instrument Flight Rules (IFR). It is essential that the FAA implement these capabilities in such a way that at a minimum, existing GPS equipment certified under FAA TSO C-129 are permitted to take advantage of them.

While many pilots anticipate utilizing the proposed capabilities, the majority of general aviation aircraft do not currently have the necessary equipment. Instead, they use the existing infrastructure and route system with existing avionics equipment. Those operations must not be adversely impacted at the expense of these proposed changes.

AOPA supports an extension to the comment period for this proposed rule because additional time is needed to understand the complexities associated with many elements of the proposal and to ensure that unintended consequences do not result from this rulemaking activity. Because 14 CFR §71 is a foundational rule for the establishment of Area Navigation (RNAV) routes, AOPA submits the following comments to the proposed changes to 14 CFR §71.

AOPA urges the FAA to use the term “ATS routes” or Air Traffic Service Routes sparingly, and only in internal orders and procedures design guidance. This term, if broadly utilized, increases the potential for confusion and creates the need for new

training without benefit. In order to avoid undermining the use of existing navigation systems, AOPA recommends that the FAA maintain the use of phraseology and terminology such as Victor and Jet airways, in pilot educational materials and on all charting products as well as in air traffic control communications. AOPA encourages the FAA to include charting and air traffic control phraseology information where “RNAV routes” are included as a new airway type in FAA educational materials. Failure to do so may negatively impact general aviation use of RNAV routes.

Since December 2000, AOPA has urged the FAA to create GPS based RNAV routes in all airspace (including non-radar airspace) with existing non-precision GPS navigation equipment certified and installed for IFR operations. AOPA requested them because they enable IFR operations at lower altitudes, increase available IFR airspace, and increase direct routing in all airspace areas. Besides the tremendous safety and efficiency benefits, RNAV routes encourage equipage with GPS, consistent with the FAA’s long term strategic planning of National Airspace System modernization.

Specifically, AOPA has identified several applications for GPS based RNAV routes, and AOPA expects to see the following capabilities emerge concurrent with the publication of this final rule. Should this not be the case, the FAA should modify additional portions of 14 CFR §71, sufficient to enable the following benefits to general aviation:

1. Reduce the minimum en route altitude required on victor airways when using GPS. The reduction should be to the minimum altitude necessary for minimum communication with ATC and/or terrain clearance limits.
2. Increase access to Class B airspace by establishing RNAV routes between 3,000-8,000 feet Above Ground Level (AGL) through the lateral and vertical limits of the class B airspace. Additional access to Class B airspace is also attainable by establishing specific routes for ingress/egress to satellite airports by small, slow general aviation aircraft equipped with GPS.
3. Increase access to special use airspace by publishing routes independent of NAVAID citing. This permits more efficient IFR operations at altitudes below 18,000 feet.
4. Enable RNAV access to geographic areas where failing navigation infrastructure is preventing pilots to access airports IFR (e.g. the outer banks of North Carolina). Without RNAV routes, this situation can result in marginal VFR operations, which traditionally have higher safety risks over IFR operations.

While many in general aviation anticipate the new capabilities that the rulemaking should enable, AOPA emphasizes that the rules should not adversely impact the majority of the

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general aviation operations which are not equipped with IFR GPS navigation equipment. Additional time is also required to completely evaluate the remainder of the proposed rule and AOPA supports and extension of the rulemaking comment period. If clarification on these comments is required, please do not hesitate to contact me at 301-695-2211.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Kenagy". The signature is written in a cursive, flowing style with a large, stylized "K".

Randy Kenagy
Director, Advanced Technology